

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA)	CASE NO. 5:19CR158
)	
Plaintiff,)	JUDGE PEARSON
)	
-vs-)	REQUEST TO EXPEDITE SENTENCING
)	
JAVIER SANCHEZ CRUZ)	
)	
Defendant.)	

On July 11, 2019 the defendant entered a plea to violating 18 U.S.C. § 911; False Claim to Citizenship. His sentencing was then scheduled for November 14, 2019. The defendant's guideline range is either 0-6 months or 1-7 months depending on criminal history. The plea agreement calls for both the government and defense to ask for a guideline sentence.

The defendant has been in custody since Jan. 3 2019 on this matter and after sentencing he will go into ICE custody for removal proceedings. Because of the guideline range and his immigration status, keeping the November sentencing date will likely result in custody time exceeding his guideline range.

Based on the foregoing, defendant requests that this court expedite his sentencing.

Respectfully submitted,

S/ Kirk A. Migdal

KIRK A. MIGDAL (0054878)

Attorney for Defendant

411 Wolf Ledges Pkwy., Ste. 400

Akron, OH 44311-1053

(330) 762-6474

FAX (330) 762-1050

KAMigdal@newman-shifrin.com